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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

November 18, 1994

OUR FILE NO.  
1137-103-61

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

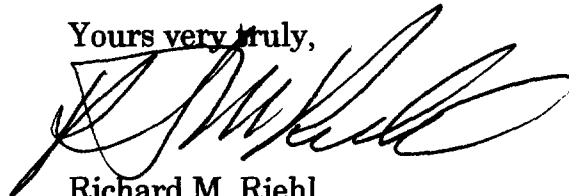
RE: Petition for Rule Making to Amend Section 73.202(b),  
The Table of Allotments, at Coleman, Tuscola and Sebewaing, MI

Dear Mr. Caton:

On behalf of Faircom Flint Inc., please find enclosed an original and four copies of a Petition for Rule Making to modify the Table of Allotments to substitute Channel 269A for Channel 268A at Coleman, Michigan and Channel 268A for Channel 269A at Tuscola, Michigan. In addition, to accommodate this allocation, the Petition proposes to substitute Channel 281A for Channel 267A at the vacant allotment at Sebewaing, Michigan.

Should you have any questions concerning this matter please contact this office directly.

Yours very truly,



Richard M. Riehl

Enclosures  
RMR/das

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NOV 18 1994FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before The

**Federal Communications Commission**

Washington, D.C. 20554

|                                 |   |               |
|---------------------------------|---|---------------|
| In the Matter of                | ) |               |
|                                 | ) |               |
| Amendment of Section 73.202(b)  | ) | MM Docket No. |
| Table of Allotments             | ) | RM No.        |
| FM Broadcast Stations,          | ) |               |
|                                 | ) |               |
| Coleman, Tuscola and Sebewaing, | ) |               |
| Michigan                        | ) |               |

TO: Chief, Mass Media Bureau

**PETITION FOR RULE MAKING**

Faircom Flint Inc. ("Faircom") licensee of Station WKMF(FM) Channel 269A, Tuscola, Michigan, by its attorneys and pursuant to Section 1.420(g)(3) of the Rules, hereby requests the Commission to amend the FM Table of Allotments (Section 73.202(b) of the Rules) as follows:

| <b><u>CITY</u></b>  | <b><u>PRESENT</u></b> | <b><u>PROPOSED</u></b> |
|---------------------|-----------------------|------------------------|
| Coleman, Michigan   | 268A                  | 269A <sup>1</sup>      |
| Tuscola, Michigan   | 269A                  | 268A <sup>2</sup>      |
| Sebewaing, Michigan | 267A                  | 281A <sup>3</sup>      |

and to order the licenses of Stations WKMF and WPRJ to be modified accordingly. In support of this request, the following is respectfully submitted:

<sup>1</sup> Channel 269A can be allocated to Coleman at WPRJ's present transmitter location, North 43° 48' 41", West 84° 27' 57". See Attachment A, p. 1.

<sup>2</sup> In order to meet spacing requirements a site restriction at approximately North 43° 16' 02", West 83° 45' 34" is necessary (See Attachment A, p. 1).

<sup>3</sup> In order to meet spacing requirements a site restriction at approximately North 43° 39' 30", West 83° 31' 00" is necessary (See Attachment A, p. 1).

### **BACKGROUND**

Stations WKMF and WPRJ are currently restricted to operating with 3kW ERP, are short-spaced to several allotments and WKMF operating on its present channel receives interference in its normal service area from Stations WILS-FM, Flint and WDET, Detroit, Michigan. Petitioner's consulting engineers, Hatfield & Dawson, have concluded that by exchanging the channel allotments at Tuscola and Coleman, both Stations will be able to operate with 6 kW ERP. Such a change will, at the same time, improve the allocation situation on these channels both domestically and in Canada. However, the assigned allocation at Sebewaing, Michigan will need to be changed from Channel 267A to 281A.

### **DISCUSSION**

Section 1.420(g)(3) of the Rules authorizes the Table of Allotments to be amended and modification of the license of the affected FM station to upgrade its facilities where the amended allotment would be mutually exclusive with the present assignment. In this case, since first adjacent channel allotments are involved, such improvement must be afforded both stations or there can be no improvement at all. As set forth below, the proposed changes in allotments satisfies all of the criteria and objectives of Section 1.420(g)(3) of the Rules<sup>4</sup>.

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<sup>4</sup> This exchange of channels would appear to qualify as an "Incompatible Channel Swap". See *Modification of FM Broadcast Licenses*, 60 RR2d 114, 120 (para. 24) (1986). Accord. *FM Channel Assignments, Blair, Nebraska*, 8 FCC Rcd 4086, 4088 (MMB 1986).

**A. Allocation of Channel 268A  
at Tuscola**

As reflected in Mr. Lockwood's technical study, the substitution of Channel 268A for Channel 269A at Tuscola, Michigan will permit Station WKMF to become a full Class A station operating with 6kW ERP. Except for the present Coleman and Sebewaing, Michigan allocations, the proposed operation of Station WKMF on Channel 268A from the reference site fully meets the protection requirements for all domestic and foreign allotments. Further, since the reference site is located only 10.6 km from the Tuscola community reference coordinates and the predicted 6kW/100m 70 dBu contour extends to 16.3 km, it is clear City coverage of Tuscola can be achieved from the reference location. See Attachment A, pp. 1 and 2.

**Domestic Considerations - The Coleman and Sebewaing Allocations.**

Specifically with respect to the **Coleman, Michigan** allocation, without changing the FM Channel allotment at Coleman, Michigan from 268A to Channel 269A, there would be a short spacing of 31.8 km (Attachment A, Ex. 2, p. 3). However, as discussed in more detail *infra.*, Channel 269A can be allotted to Coleman, in lieu of Channel 268A, at Station WPRJ's present transmitter location in full compliance with all domestic and foreign allocations requirements. Further, this proposed change in the Coleman allocation will, for the first time, permit the operation of Station WPRJ with full Class A facilities.

As to the **Sebewaing, Michigan** allotment, the proposed allocation of Channel 268A at Tuscola is 5.8 km short spaced to the

vacant allocation of Channel 267A at Sebewaing, Michigan. (Attachment A, Ex. 2, p. 3)<sup>5</sup>. There are no applications pending for the present allotment, and thus a change of this allocation to Channel 281A will inconvenience no one. Further, the allocation of Channel 281A at the proposed reference location (N 43-39-30; W 83-31-00) meets all of the separation requirements for domestic and foreign allotments (Attachment A, p. 3 and Ex. 3). Finally, since the reference site is located only 9.76 km from the Sebewaing community reference coordinates and the predicted 6kW/100m 70 dBu contour extends to 16.3 km, it is clear City coverage of Sebewaing can be achieved from the reference location. See Attachment A, p. 3 and Ex. 3, p. 4.

#### **Canadian Considerations.**

The allotment of Channel 268A at the proposed Tuscola reference location is fully spaced for 6kW Class A operation under the Domestic Rules<sup>6</sup> to the unused co-channel Canadian allotment at Sarnia, Ontario (Attachment A, p. 2). Further, operation of WKMF with 6kW at 100m HAAT completely satisfies the requirements for proposed allotments which do not conform to the *Table of Minimum Distance Separations* set forth in the *Working Arrangement* with Canada, Section 5.1.2 *et seq.* (Attachment A, p. 2). The attached map (Attachment A, Ex. 1, p. 5), demonstrates that the 34 dBu F(50;10) contour of the proposed Channel 268A allocation at Tuscola does not extend onto Canadian territory within the protected 54 dBu contour of the Sarnia co-channel allocation.

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<sup>5</sup> This allocation has been available for application since the end of 1990.

<sup>6</sup> Notification of a Class B-1 station to Canada with a restriction of 6kW at 100m HAAT will be required. (Attachment A, p. 2)

In addition, while not an allocation mandate, it should be noted that, based on domestic allocations criteria, the situation between WKMF, Tuscola and CKNX, Wingham, Ontario (Ch. 269C1) will be improved. These allocations, with WKMF operating with only 3kW, are presently short-spaced by 49.6 km. Operation of WKMF on Channel 268A will entirely eliminate this short-spacing. (Attachment A, Ex. 1, pp. 1 and 4).

**Additional Public Interest Considerations.**

WKMF's present facilities are short-spaced by 10 km to co-channel station WILS, Lansing and by 5.5 km to WDET (Channel 270B-grandfathered with 79kW at 137m HAAT). (Attachment A, Ex. 1, p. 1). In addition, actual interference in WKMF's normal service area is being experienced from these stations. The change in channel allotment at Tuscola to Channel 268A will eliminate these short-spacings and improve service on these respective channels.

**B. Allocation of Channel 269A  
at Coleman, Michigan**

As with the change in the Tuscola allocation, the exchange of Channel 269A for Channel 268A at Coleman, Michigan will permit Station WPRJ to achieve full Class A operation -- something impossible to achieve with the present allocation. (Attachment A, p. 2).

Mr. Lockwood's study establishes that the substitution of Channel 269A for Channel 268A at Coleman, Michigan at Station WPRJ's present transmitter location meets all domestic and foreign allotments requirements. (Attachment A, p. 2).

Faircom hereby commits to pay those costs incident to WPRJ's channel change as required by the Commission.

**Conclusion**

The foregoing establishes that Channels 268A and 269A can be substituted at Tuscola and Coleman, Michigan respectively in full compliance with all domestic and foreign allotment requirements at the indicated reference coordinates, subject only to the substitution of Channel 281A for the vacant Channel 267A allotment at Sebewaing, Michigan. The allocation of Channel 281A at Sebewaing also satisfies all domestic and foreign allocations requirements. The change will also permit both stations - now operating with 3kW ERP - to become full Class A FM Stations.

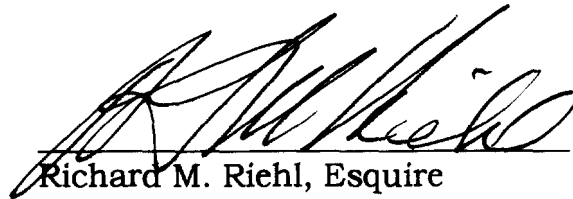
In addition, the assignment of Channel 268A at Tuscola will alleviate significant existing short-spacings with Stations WDET, Detroit and WILS, Lansing, Michigan. Finally, Faircom has committed to reimburse WPRJ Coleman for those costs incident to its change of channels and, if Channel 268A is allocated to Tuscola, Faircom will immediately proceed to implement the modification of WKMF's license.

In view of the foregoing, the Commission is requested to amend Section 73.202 of the Rules - the FM Table of allotments - in the following respects:

| <u>CITY</u>         | <u>PRESENT</u> | <u>PROPOSED</u>   |
|---------------------|----------------|-------------------|
| Coleman, Michigan   | 268A           | 269A <sup>7</sup> |
| Tuscola, Michigan   | 269A           | 268A <sup>8</sup> |
| Sebewaing, Michigan | 267A           | 281A <sup>9</sup> |

Respectfully submitted,

**FAIRCOM FLINT INC.**

  
Richard M. Riehl, Esquire  
Its Attorney

HALEY, BADER & POTTS  
4350 North Fairfax Drive, Suite 900  
Arlington, VA 22203-1633  
703/841-0606

November 18, 1994

<sup>7</sup> Channel 269A can be allocated to Coleman at WPRJ's present transmitter location, North 43°48'41", West 84°27'57". See Attachment A, p. 1.

<sup>8</sup> In order to meet spacing requirements a site restriction at approximately North 43° 16' 02", West 83° 45' 34" is necessary (See Attachment A, p. 1).

<sup>9</sup> In order to meet spacing requirements a site restriction at approximately North 43° 39' 30", West 83° 31' 00" is necessary (See Attachment A, p. 1).



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## ENGINEERING STATEMENT

### PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATIONS COMMISSION

FAIRCOM FLINT, INC.

NOVEMBER 1994

## **ENGINEERING STATEMENT**

This Engineering Statement has been prepared on behalf of Faircom Flint, Inc. in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to reassign the following channels:

| CITY                       | PRESENT | PROPOSED |
|----------------------------|---------|----------|
| WPRJ Coleman, Michigan     | 268A    | 269A     |
| WKMF Tuscola, Michigan     | 269A    | 268A     |
| Unused Sebewaing, Michigan | 267A    | 281A     |

The purpose of this reassignment is to provide full class A allotment to all three communities. The present allocations for Coleman and Tuscola are short-spaced to other stations and are unable to implement full class A service to their communities. The following table is a summary of the proposed locations in the reassignment plan:

|                               | Present Site               | Proposed Site              | Change<br>(Distance and<br>Bearing) | Distance to City<br>of License |
|-------------------------------|----------------------------|----------------------------|-------------------------------------|--------------------------------|
| WPRJ<br>Coleman, Michigan     | 43° 48' 41"<br>84° 27' 57" | 43° 48' 41"<br>84° 27' 57" | No Change                           | 11.4 km<br>237.8° T            |
| WKMF<br>Tuscola, Michigan     | 43° 16' 12"<br>83° 30' 14" | 43° 16' 02"<br>83° 45' 34" | 20.8 km<br>269.2° T                 | 10.6 km<br>51.5° T             |
| Unused<br>Sebewaing, Michigan | 43° 48' 01"<br>83° 23' 38" | 43° 39' 30"<br>83° 31' 00" | 18.6 km<br>212.0° T                 | 9.8 km<br>32.7° T              |

**WPRJ Coleman, Michigan**

The proposed allotment of channel 269A at Coleman, Michigan meets all of the separation requirements for domestic and foreign allotments from the licensed site of WPRJ, except for the present Tuscola allotment that is proposed to be changed. This change will allow WPRJ to operate with the maximum class ERP of 6 kW. The WPRJ site is located 11.4 km from the reference coordinates for the community of Coleman; therefore 70 dBu coverage of the community will be achieved.

**WKMF Tuscola, Michigan**

As shown in the attached channel studies, WKMF can operate from a reference site at 43° 16' 03" x 83° 45' 34" and fully meet the protection requirements for all domestic and foreign allotments, except for the present Coleman (WPRJ) and Sebewaing (Unused) allotments that are proposed to be changed. The reference site is fully spaced for 6 kW class A operation under the domestic rules from the channel 268A co-channel allotment (Unused) at Sarnia, Ontario. Notification as a class B-1 station to Canada would be required, with a restriction to operation at 6 kW and an antenna height of 100 meters above average terrain. Operation with 6 kW at an antenna height of 100 meters above average terrain fully meets the requirements for proposed allotments that do not conform to the Table of Minimum Distance Separations set out in the *"Agreement Between the Government of Canada and the Government of the United States of America Relating the FM Broadcasting Service and the Associated Working Arrangement, Ottawa, February 1991"* with Canada, per Sections 5.2 of the Working Arrangement. The attached map shows that the 34 dBu F(50:10) contour of the proposed channel 268A allotment does not extend onto Canadian territory; all of the overlap between the proposed 34 dBu contour and the protected 54 dBu F(50:50) contour (33 km radius) of the Sarnia, Ontario co-channel allotment occur within U.S. territory. The reference site is located 10.6 km from the reference coordinates for the community of Tuscola, and therefore 70 dBu coverage of the community will be achieved.

**Vacant Allotment Sebewaing, Michigan**

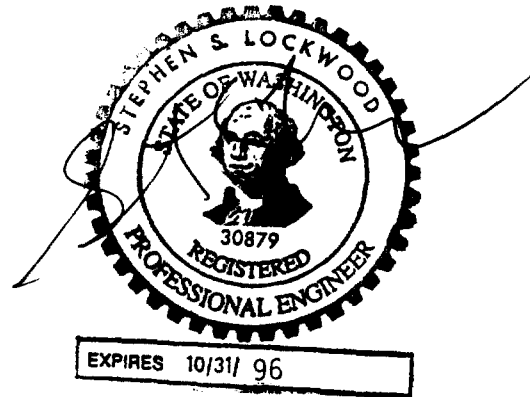
The proposed allotment of channel 281 at Sebewaing meets all of the separation requirements for domestic and foreign allotments at a new set of reference coordinates; 43° 39' 30" X 83° 31' 00". The reference site is located 9.8 km from the reference coordinates for the community of Sebewaing, therefore 70 dBu coverage of the community will be achieved.

**CERTIFICATION**

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments has been prepared on behalf of Faircom Flint, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer Whose qualifications are a matter of record with the Federal Communications Commission. I am a staff engineer with the firm of Hatfield & Dawson, Consulting Engineers, and am Registered as a Professional Engineer in the State of Washington.

16 November 1994

Stephen S. Lockwood, P.E.



Hatfield & Dawson Consulting Engineers

**Appendix 1**  
**Exhibits for**  
**WPRJ(FM) Coleman, Michigan**

## Basic Station Data

|                           |           |              |            |
|---------------------------|-----------|--------------|------------|
| Station:                  | WPRJ      | City:        | Coleman    |
| Frequency:                | 101.5 MHz | State:       | MI         |
| Channel:                  | 268       | Country:     | US         |
| Class:                    | A         | Coordinates: | N 43 48 41 |
| Facility:                 | FM        |              | W 84 27 57 |
| Domestic Status: LIC      |           |              |            |
| File Number: BLH-921120KC |           |              |            |
| Docket:                   |           |              |            |
| Cutoff Date:              |           |              |            |
| Section 73.215: N         |           |              |            |
| Last Change Date: 930409  |           |              |            |
| FM Database Date: 940927  |           |              |            |

|                  | Horizontal | Vertical |
|------------------|------------|----------|
| ERP:             | 2.200 kW   | 2.200 kW |
| Rad Center AGL:  | 112 m      | 112 m    |
| Rad Center AMSL: | 328 m      | 328 m    |
| HAAT:            | 114 m      | 114 m    |
| HAAT Max:        | 126 m      |          |

Beam Tilt: N  
Directional Antenna: N

## Coordination/Notification

|                       |        |                              |
|-----------------------|--------|------------------------------|
| International Status: | OPER   | Operating primary assignment |
| Coordination Status:  |        | Not applicable               |
| Border:               | Canada |                              |
| Distance:             | 181 km |                              |
| Last Notify Date:     |        |                              |
| International Class:  | A      |                              |

## Applicant/Licensee Name

Come Together Ministries, Inc.

## Comment

None.

FM SEPARATION STUDY

Job Title : Licensed WPRJ(FM) CH 268

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-48-41 84-27-57

| Call<br>Status  | City<br>State      | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km)   | Req.<br>(km) |
|---|--------------------|--------------|------------------|--------------------|-----------------------|--------------------|-----------------|--------------|
| WQAC<br>LIC   | Alma<br>MI         | BLE930402KA  | 215A<br>90.9     | 0.1<br>20.0        | 43-22-46<br>84-40-25  | 199.3              | 50.85<br>40.85  | 10<br>CLEAR  |
| WBTZ<br>CP  | Pinconning<br>MI   | BPH891106IE  | 265A<br>100.9    | 2.6<br>151.0       | 43-50-46<br>84-05-32  | 82.5               | 30.31<br>-.69   | 31<br>SHORT  |
| CP Cancelled 940121-307 Application being treated as Petition for Recon.<br>Proposed to Canada as B1 on 900306-Specially negotiated short spaced allot-<br>ment w/Power Ltd. to 2.6kw and Haat not to exceed 167m-Accepted by Canada<br>on 910305 |                    |              |                  |                    |                       |                    |                 |              |
| WBTZ<br>LIC   | Pinconning<br>MI   | BLH880826KD  | 265A<br>100.9    | 1.30<br>151.0      | 43-50-46<br>84-05-32  | 82.5               | 30.31<br>-.69   | 31<br>SHORT  |
| WGRYFM<br>LIC   | Roscommon<br>MI    | BLH900322KB  | 266A<br>101.1    | 3.40<br>135.0      | 44-34-15<br>84-41-33  | 348.0              | 86.32<br>55.32  | 31<br>CLEAR  |
| Class B1 with respect to Canada   |                    |              |                  |                    |                       |                    |                 |              |
| ALC   | Sebewaing<br>MI    | Docket89-38  | 267A<br>101.3    | .0                 | 43-48-01<br>83-23-38  | 90.5               | 86.28<br>14.28  | 72<br>CLOSE  |
| Class B1 in respect to Canada-Accepted by Canada 901105<br>Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38  |                    |              |                  |                    |                       |                    |                 |              |
| WCUZFM<br>LIC   | Grand Rapids<br>MI | BLH5400      | 267B<br>101.3    | 50.<br>128.0       | 43-02-28<br>85-21-28  | 220.4              | 111.99<br>-1.01 | 113<br>SHORT |
| WCUZFM<br>CP  | Grand Rapids<br>MI | BPH890623ID  | 267B<br>101.3    | 26.<br>214.0       | 43-02-28<br>85-31-04  | 225.1              | 120.76<br>7.76  | 113<br>CLOSE |
| WCUZFM<br>APP   | Grand Rapids<br>MI | BMPH940720IB | 267B<br>101.3    | 50.0<br>129.0      | 43-02-01<br>85-31-15  | 224.9              | 121.53<br>8.53  | 113<br>CLOSE |
| WPRJ<br>LIC   | Coleman<br>MI      | BLH921120KC  | 268A<br>101.5    | 2.2<br>114.0       | 43-48-41<br>84-27-57  | .0                 | .00<br>-115.00  | 115<br>SHORT |
| WXYQ<br>CP  | Manistee<br>MI     | BPH900410MH  | 268A<br>101.5    | 6.0<br>35.0        | 44-12-18<br>86-17-22  | 287.3              | 152.66<br>37.66 | 115<br>CLEAR |
| Accepted by Canada on 921013  |                    |              |                  |                    |                       |                    |                 |              |
|   | Sarnia<br>ON       |              | 268A<br>101.5    | .0                 | 42-58-20<br>82-23-48  | 118.5              | 191.84<br>11.84 | 180<br>CLOSE |
| SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.   |                    |              |                  |                    |                       |                    |                 |              |

FM SEPARATION STUDY

Job Title : Licensed WPRJ(FM) CH 268

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-48-41 84-27-57

| Call<br>Status   | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| WKMFFM   | Tuscola       |              | 269A             | 3.00               | 43-16-12              | 127.5              | 98.31         | 72           |
| LIC  | MI            | BLH880404KC  | 101.7            | 100.0              | 83-30-14              |                    | 26.31         | CLEAR        |
| Specially negotiated, short-spaced allotment-Accepted by Canada 940207 |               |              |                  |                    |                       |                    |               |              |
| WILSFM   | Lansing       |              | 269A             | 3.3                | 42-43-16              | 183.3              | 121.33        | 72           |
| LIC  | MI            | BLH930430KB  | 101.7            | 88.0               | 84-33-01              |                    | 49.33         | CLEAR        |
| Accepted by Canada on 930322   |               |              |                  |                    |                       |                    |               |              |
| WLDR   | Traverse City |              | 270C1            | 100.               | 44-46-13              | 317.9              | 144.86        | 75           |
| LIC  | MI            | BLH920403KB  | 101.9            | 192.0              | 85-41-43              |                    | 69.86         | CLEAR        |
| WLEWFM   | Bad Axe       |              | 271C2            | 50.                | 43-53-28              | 84.8               | 108.28        | 55           |
| LIC  | MI            | BLH890117KK  | 102.1            | 150.0              | 83-07-26              |                    | 53.28         | CLEAR        |

\*\* End of separation study for channel 268A \*\*



FM SEPARATION STUDY

Job Title : Proposed WPRJ(FM) CH 269

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 269A (101.7 MHz)

Coordinates : 43-48-41 84-27-57

| Call<br>Status   | City<br>State          | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km)   | Req.<br>(km) |
|--|------------------------|--------------|------------------|--------------------|-----------------------|--------------------|-----------------|--------------|
| WQAC<br>LIC  | Alma<br>MI             | BLED930402KA | 215A<br>90.9     | 0.1<br>20.0        | 43-22-46<br>84-40-25  | 199.3              | 50.85<br>40.85  | 10<br>CLEAR  |
| WGRYFM<br>LIC  | Roscommon<br>MI        | BLH900322KB  | 266A<br>101.1    | 3.40<br>135.0      | 44-34-15<br>84-41-33  | 348.0              | 86.32<br>55.32  | 31<br>CLEAR  |
| Class B1 with respect to Canada  |                        |              |                  |                    |                       |                    |                 |              |
| ALC  | Sebewaing<br>MI        | Docket89-38  | 267A<br>101.3    | .0                 | 43-48-01<br>83-23-38  | 90.5               | 86.28<br>55.28  | 31<br>CLEAR  |
| Class B1 in respect to Canada-Accepted by Canada 901105                |                        |              |                  |                    |                       |                    |                 |              |
| Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38        |                        |              |                  |                    |                       |                    |                 |              |
| WCUZFM<br>LIC  | Grand Rapids<br>MI     | BLH5400      | 267B<br>101.3    | 50.<br>128.0       | 43-02-28<br>85-21-28  | 220.4              | 111.99<br>42.99 | 69<br>CLEAR  |
| WPRJ<br>LIC  | Coleman<br>MI          | BLH921120KC  | 268A<br>101.5    | 2.2<br>114.0       | 43-48-41<br>84-27-57  | .0                 | .00<br>-72.00   | 72<br>SHORT  |
| WKMFFM<br>LIC  | Tuscola<br>MI          | BLH880404KC  | 269A<br>101.7    | 3.00<br>100.0      | 43-16-12<br>83-30-14  | 127.5              | 98.31<br>-16.69 | 115<br>SHORT |
| Specially negotiated, short-spaced allotment-Accepted by Canada 940207 |                        |              |                  |                    |                       |                    |                 |              |
| WILSFM<br>LIC  | Lansing<br>MI          | BLH930430KB  | 269A<br>101.7    | 3.3<br>88.0        | 42-43-16<br>84-33-01  | 183.3              | 121.33<br>6.33  | 115<br>CLOSE |
| Accepted by Canada on 930322   |                        |              |                  |                    |                       |                    |                 |              |
| WMRR<br>LIC  | Muskegon Heights<br>MI | BLH930624KG  | 269B1<br>101.7   | 15.0<br>93.0       | 43-16-38<br>86-20-05  | 249.1              | 162.29<br>19.29 | 143<br>CLEAR |
| From Channel 269A Per D91-337  |                        |              |                  |                    |                       |                    |                 |              |
| WMRR<br>CP   | Muskegon Heights<br>MI | BPH931216ID  | 269B1<br>101.7   | 12.0<br>145.0      | 43-16-38<br>86-20-05  | 249.1              | 162.29<br>19.29 | 143<br>CLEAR |
| CKNXFM<br>ON   | Wingham<br>ON          |              | 269C1<br>101.7   | 100. DA<br>216.0   | 44-05-26<br>81-12-26  | 82.1               | 263.42<br>7.42  | 256<br>CLOSE |
| SPECIALLY NEGOTIATED SHORT-SPACED ALLOCATION                           |                        |              |                  |                    |                       |                    |                 |              |
| WLDR<br>LIC  | Traverse City<br>MI    | BLH920403KB  | 270C1<br>101.9   | 100.<br>192.0      | 44-46-13<br>85-41-43  | 317.9              | 144.86<br>11.86 | 133<br>CLOSE |

FM SEPARATION STUDY

Job Title : Proposed WPRJ(FM) CH 269

Separation Buffer 50 km

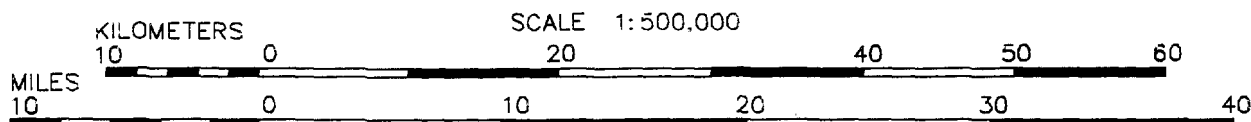
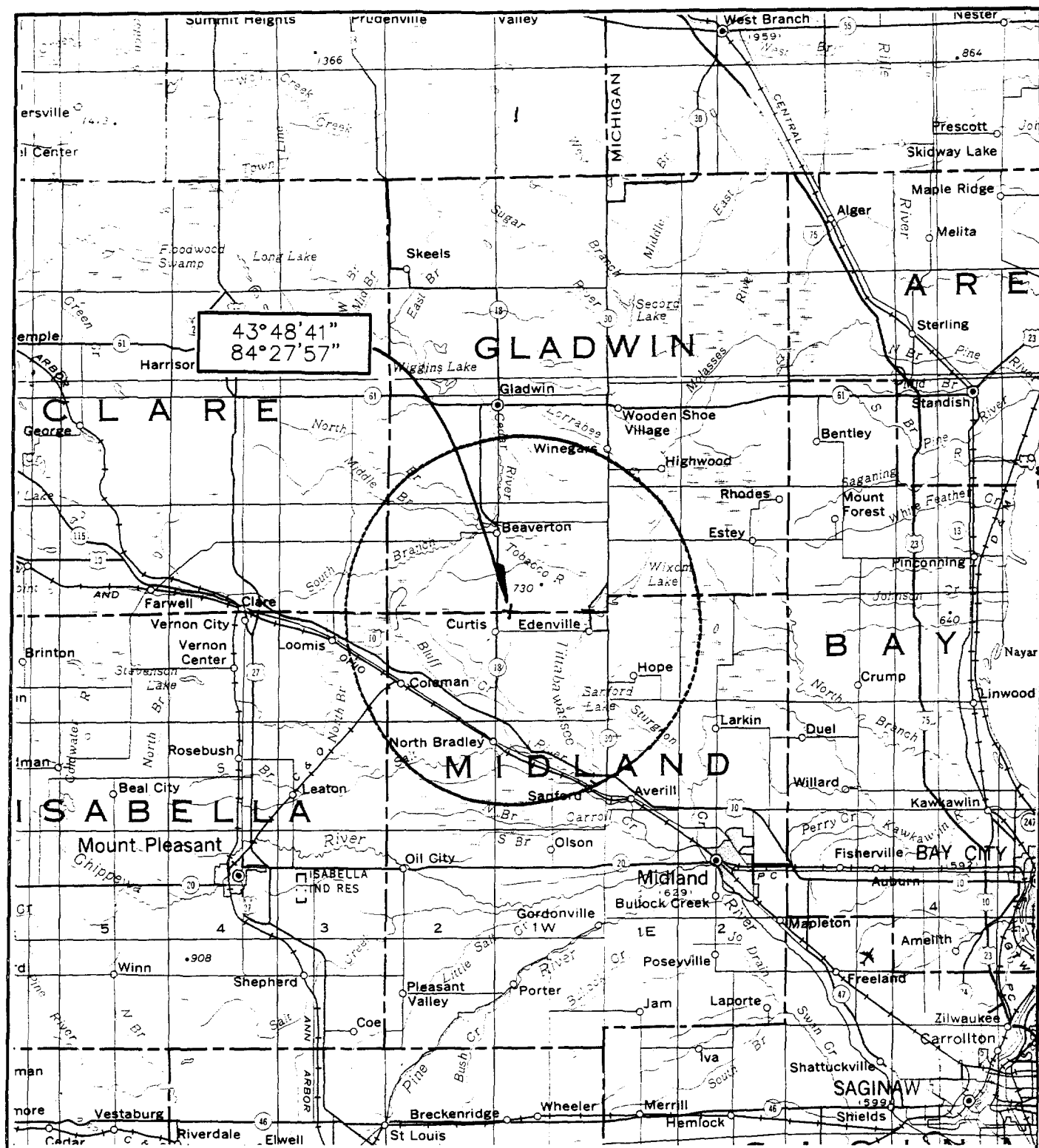
FCC DB Date : 10/25/94

Channel 269A (101.7 MHz)

Coordinates : 43-48-41 84-27-57

| Call<br>Status | City<br>State    | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km)   | Req.<br>(km) |
|----------------|------------------|--------------|------------------|--------------------|-----------------------|--------------------|-----------------|--------------|
| WLEWFM<br>LIC  | Bad Axe<br>MI    | BLH890117KK  | 271C2<br>102.1   | 50.<br>150.0       | 43-53-28<br>83-07-26  | 84.8               | 108.28<br>53.28 | 55<br>CLEAR  |
| WPZX<br>LIC    | Big Rapids<br>MI | BLH921112KE  | 272C3<br>102.3   | 10.5<br>133.0      | 43-41-01<br>85-34-56  | 261.4<br>SS        | 91.05<br>49.05  | 42<br>CLEAR  |

\*\* End of separation study for channel 269A \*\*



HATFIELD & DAWSON  
CONSULTING ENGINEERS

COLEMAN, MI  
PROPOSED WPRJ(FM) OPERATION ON  
CHANNEL 269A 6kW ERP AT 100m HAAT

FAIRCOM FLINT, INC

11/94

**Appendix 2**  
**Exhibits for**  
**WKMF(FM) Tuscola, Michigan**

## Basic Station Data

|                           |           |              |            |
|---------------------------|-----------|--------------|------------|
| Station:                  | WKMF      | City:        | Tuscola    |
| Frequency:                | 101.7 MHz | State:       | MI         |
| Channel:                  | 269       | Country:     | US         |
| Class:                    | A         | Coordinates: | N 43 16 12 |
| Facility:                 | FM        |              | W 83 30 14 |
| Domestic Status: LIC      |           |              |            |
| File Number: BLH-880404KC |           |              |            |
| Docket:                   |           |              |            |
| Cutoff Date:              |           |              |            |
| Section 73.215: N         |           |              |            |
| Last Change Date: 940310  |           |              |            |
| FM Database Date: 940927  |           |              |            |

|                  | Horizontal | Vertical |
|------------------|------------|----------|
| ERP:             | 3.000 kW   | 3.000 kW |
| Rad Center AMSL: | 334 m      | 334 m    |
| HAAT:            | 100 m      | 100 m    |
| HAAT Max:        | 133 m      |          |

Beam Tilt: N  
Directional Antenna: N

## Coordination/Notification

|                       |        |                              |
|-----------------------|--------|------------------------------|
| International Status: | OPER   | Operating primary assignment |
| Coordination Status:  |        | Not applicable               |
| Border:               | Canada |                              |
| Distance:             | 92 km  |                              |
| Last Notify Date:     |        |                              |
| International Class:  | B1     |                              |

Applicant/Licensee Name  
Radiocom, Ltd.

## Comment

Specially negotiated, short-spaced allotment-Accepted by Canada 940207

FM SEPARATION STUDY

Job Title : Licensed WKMF(FM) CH 269 Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 269A (101.7 MHz) Coordinates : 43-16-12 83-30-14

| Call<br>Status | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|

|  |       |             |      |         |          |       |       |       |
|--|-------|-------------|------|---------|----------|-------|-------|-------|
| WFUMFM   | Flint |             | 216B | 17.5 DA | 42-53-57 | 175.2 | 41.35 | 15    |
| LIC  | MI    | BLD930906KA | 91.1 | 149.0   | 83-27-42 |       | 26.35 | CLEAR |
| ERP lower than class minimum-Special negotiated short spaced allotment limited to 29Kw at 149m haat. |       |             |      |         |          |       |       |       |

|                                    |         |         |       |       |          |       |       |       |
|------------------------------------|---------|---------|-------|-------|----------|-------|-------|-------|
| WRIF                               | Detroit |         | 266B  | 27.0  | 42-28-15 | 166.8 | 91.18 | 69    |
| LIC                                | MI      | BLH5812 | 101.1 | 268.0 | 83-15-00 |       | 22.18 | CLEAR |
| GRANDFATHERED AT 27KW @ 268M HAAT. |         |         |       |       |          |       |       |       |

|   |             |  |       |    |          |     |       |       |
|---|-------------|--|-------|----|----------|-----|-------|-------|
| ALC   | Sebewaing   |  | 267A  |    | 43-48-01 | 8.5 | 59.59 | 31    |
| MI  | Docket89-38 |  | 101.3 | .0 | 83-23-38 |     | 28.59 | CLEAR |
| Class B1 in respect to Canada-Accepted by Canada 901105         |             |  |       |    |          |     |       |       |
| Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38 |             |  |       |    |          |     |       |       |

|   |        |  |       |    |          |       |        |       |
|---|--------|--|-------|----|----------|-------|--------|-------|
|   | Sarnia |  | 268A  |    | 42-58-20 | 109.8 | 96.00  | 113   |
|   | ON     |  | 101.5 | .0 | 82-23-48 |       | -17.00 | SHORT |
| SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION. |        |  |       |    |          |       |        |       |

|      |         |             |       |       |          |       |       |       |
|------|---------|-------------|-------|-------|----------|-------|-------|-------|
| WPRJ | Coleman |             | 268A  | 2.2   | 43-48-41 | 308.2 | 98.31 | 72    |
| LIC  | MI      | BLH921120KC | 101.5 | 114.0 | 84-27-57 |       | 26.31 | CLEAR |

|  |         |             |       |       |          |    |         |       |
|--|---------|-------------|-------|-------|----------|----|---------|-------|
| WKMFFM   | Tuscola |             | 269A  | 3.00  | 43-16-12 | .0 | .00     | 115   |
| LIC  | MI      | BLH880404KC | 101.7 | 100.0 | 83-30-14 |    | -115.00 | SHORT |
| Specially negotiated, short-spaced allotment-Accepted by Canada 940207 |         |             |       |       |          |    |         |       |

|                              |         |             |       |      |          |       |        |       |
|------------------------------|---------|-------------|-------|------|----------|-------|--------|-------|
| WILSFM                       | Lansing |             | 269A  | 3.3  | 42-43-16 | 234.7 | 104.89 | 115   |
| LIC                          | MI      | BLH930430KB | 101.7 | 88.0 | 84-33-01 |       | -10.11 | SHORT |
| Accepted by Canada on 930322 |         |             |       |      |          |       |        |       |

|  |         |  |       |         |          |      |        |       |
|--|---------|--|-------|---------|----------|------|--------|-------|
| CKNXFM                                       | Wingham |  | 269C1 | 100. DA | 44-05-26 | 62.9 | 206.42 | 256   |
|  | ON      |  | 101.7 | 216.0   | 81-12-26 |      | -49.58 | SHORT |
| SPECIALLY NEGOTIATED SHORT-SPACED ALLOCATION |         |  |       |         |          |      |        |       |

|  |         |         |       |       |          |       |        |       |
|--|---------|---------|-------|-------|----------|-------|--------|-------|
| WDETFM   | Detroit |         | 270B  | 79.   | 42-21-28 | 160.4 | 107.51 | 113   |
| LIC  | MI      | BLH7131 | 101.9 | 137.0 | 83-03-55 |       | -5.49  | SHORT |
| COMM. CH. OPER. EDUC. - GRANDFATHERED AT 79KW @ 137M HAAT. |         |         |       |       |          |       |        |       |

|        |         |             |       |       |          |      |       |       |
|--------|---------|-------------|-------|-------|----------|------|-------|-------|
| WLEWFM | Bad Axe |             | 271C2 | 50.   | 43-53-28 | 23.8 | 75.54 | 55    |
| LIC    | MI      | BLH890117KK | 102.1 | 150.0 | 83-07-26 |      | 20.54 | CLEAR |

Hatfield & Dawson  
Consulting Engineers  
Seattle, Washington

Page: 2  
11/16/94

FM SEPARATION STUDY

Job Title : Licensed WKMF(FM) CH 269

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 269A (101.7 MHz)

Coordinates : 43-16-12 83-30-14

| Call   | City  | Channel      | ERP(kW) | Latitude | Bearing   | Dist.   | Req. |
|--------|-------|--------------|---------|----------|-----------|---------|------|
| Status | State | FCC File No. | Freq.   | HAAT(m)  | Longitude | deg-Tru | (km) |

|      |            |             |       |          |          |       |       |
|------|------------|-------------|-------|----------|----------|-------|-------|
| WGRT | Port Huron | 272A        | 3.00  | 43-04-08 | 104.7    | 86.22 | 31    |
| LIC  | MI         | BLH911230KD | 102.3 | 97.0     | 82-28-48 | 55.22 | CLEAR |

Specially negotiated, short-spaced allotment, limited to 3.0kW ERP and 100m  
HAAT or the equivalent along the 87.8 degree azimuth towards channel 272B\*  
(L) in Woodstock, ON.-Accepted by Canada 940207

\*\* End of separation study for channel 269A \*\*

FM SEPARATION STUDY

Job Title : Proposed WKMF(FM) CH 268

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-16-02 83-45-34

| Call<br>Status | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|

|  |          |              |       |       |          |      |       |       |
|--|----------|--------------|-------|-------|----------|------|-------|-------|
| WNFR   | Sandusky |              | 214B1 | 18.0  | 43-27-32 | 71.4 | 68.09 | 12    |
| CP   | MI       | BPED920826MB | 90.7  | 100.0 | 82-57-42 |      | 56.09 | CLEAR |
| Accepted by Canada on 930302-Specially negotiated short-spaced allotment, limited to 19.0 kw ERP at 100m HAAT or equivalent, along the 95.3 azimuth towards channel 214B in Paris, ON. |          |              |       |       |          |      |       |       |

|      |      |              |      |      |          |       |       |       |
|------|------|--------------|------|------|----------|-------|-------|-------|
| WQAC | Alma |              | 215A | 0.1  | 43-22-46 | 279.9 | 75.20 | 10    |
| LIC  | MI   | BLED930402KA | 90.9 | 20.0 | 84-40-25 |       | 65.20 | CLEAR |

|  |            |             |       |       |          |       |       |       |
|--|------------|-------------|-------|-------|----------|-------|-------|-------|
| WBTZ   | Pinconning |             | 265A  | 2.6   | 43-50-46 | 337.5 | 69.72 | 31    |
| CP   | MI         | BPH891106IE | 100.9 | 151.0 | 84-05-32 |       | 38.72 | CLEAR |
| CP Cancelled 940121-307 Application being treated as Petition for Recon. Proposed to Canada as B1 on 900306-Specially negotiated short spaced allotment w/Power Ltd. to 2.6kw and Haat not to exceed 167m-Accepted by Canada on 910305 |            |             |       |       |          |       |       |       |

|      |            |             |       |       |          |       |       |       |
|------|------------|-------------|-------|-------|----------|-------|-------|-------|
| WBTZ | Pinconning |             | 265A  | 1.30  | 43-50-46 | 337.5 | 69.72 | 31    |
| LIC  | MI         | BLH880826KD | 100.9 | 151.0 | 84-05-32 |       | 38.72 | CLEAR |

|                                    |         |         |       |       |          |       |       |       |
|------------------------------------|---------|---------|-------|-------|----------|-------|-------|-------|
| WRIF                               | Detroit |         | 266B  | 27.0  | 42-28-15 | 154.7 | 97.79 | 69    |
| LIC                                | MI      | BLH5812 | 101.1 | 268.0 | 83-15-00 |       | 28.79 | CLEAR |
| GRANDFATHERED AT 27KW @ 268M HAAT. |         |         |       |       |          |       |       |       |

|  |           |             |       |    |          |      |       |       |
|--|-----------|-------------|-------|----|----------|------|-------|-------|
| ALC  | Sebewaing |             | 267A  |    | 43-48-01 | 26.3 | 66.20 | 72    |
|  | MI        | Docket89-38 | 101.3 | .0 | 83-23-38 |      | -5.80 | SHORT |
| Class B1 in respect to Canada-Accepted by Canada 901105<br>Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38 |           |             |       |    |          |      |       |       |

|        |              |         |       |       |          |       |        |       |
|--------|--------------|---------|-------|-------|----------|-------|--------|-------|
| WCUZFM | Grand Rapids |         | 267B  | 50.   | 43-02-28 | 259.6 | 132.42 | 113   |
| LIC    | MI           | BLH5400 | 101.3 | 128.0 | 85-21-28 |       | 19.42  | CLEAR |

|        |              |             |       |       |          |       |        |       |
|--------|--------------|-------------|-------|-------|----------|-------|--------|-------|
| WCUZFM | Grand Rapids |             | 267B  | 26.   | 43-02-28 | 260.6 | 145.22 | 113   |
| CP     | MI           | BPH890623ID | 101.3 | 214.0 | 85-31-04 |       | 32.22  | CLEAR |

|        |              |              |       |       |          |       |        |       |
|--------|--------------|--------------|-------|-------|----------|-------|--------|-------|
| WCUZFM | Grand Rapids |              | 267B  | 50.0  | 43-02-01 | 260.3 | 145.62 | 113   |
| APP    | MI           | BMPH940720IB | 101.3 | 129.0 | 85-31-15 |       | 32.62  | CLEAR |

|      |         |             |       |       |          |       |        |       |
|------|---------|-------------|-------|-------|----------|-------|--------|-------|
| WPRJ | Coleman |             | 268A  | 2.2   | 43-48-41 | 317.0 | 83.17  | 115   |
| LIC  | MI      | BLH921120KC | 101.5 | 114.0 | 84-27-57 |       | -31.83 | SHORT |



FM SEPARATION STUDY

Job Title : Proposed WKMF(FM) CH 268

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-16-02 83-45-34

| Call<br>Status | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
|----------------|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|

|  |              |  |               |  |                      |       |                  |              |
|--|--------------|--|---------------|--|----------------------|-------|------------------|--------------|
|  | Sarnia<br>ON |  | 268A<br>101.5 |  | 42-58-20<br>82-23-48 | 106.1 | 115.66<br>-64.34 | 180<br>SHORT |
|--|--------------|--|---------------|--|----------------------|-------|------------------|--------------|

SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.

|             |              |  |               |               |                      |       |               |              |
|-------------|--------------|--|---------------|---------------|----------------------|-------|---------------|--------------|
| WLQR<br>LIC | Toledo<br>OH |  | 268B<br>101.5 | 19.0<br>246.0 | 41-41-02<br>83-24-47 | 170.7 | 178.18<br>.18 | 178<br>CLOSE |
|-------------|--------------|--|---------------|---------------|----------------------|-------|---------------|--------------|

|               |               |  |               |               |                      |      |                 |             |
|---------------|---------------|--|---------------|---------------|----------------------|------|-----------------|-------------|
| WKMFFM<br>LIC | Tuscola<br>MI |  | 269A<br>101.7 | 3.00<br>100.0 | 43-16-12<br>83-30-14 | 89.1 | 20.76<br>-51.24 | 72<br>SHORT |
|---------------|---------------|--|---------------|---------------|----------------------|------|-----------------|-------------|

Specially negotiated, short-spaced allotment-Accepted by Canada 940207

|               |               |  |               |             |                      |       |                |             |
|---------------|---------------|--|---------------|-------------|----------------------|-------|----------------|-------------|
| WILSFM<br>LIC | Lansing<br>MI |  | 269A<br>101.7 | 3.3<br>88.0 | 42-43-16<br>84-33-01 | 226.9 | 88.55<br>16.55 | 72<br>CLEAR |
|---------------|---------------|--|---------------|-------------|----------------------|-------|----------------|-------------|

Accepted by Canada on 930322

|              |         |  |                |                  |                      |      |                 |              |
|--------------|---------|--|----------------|------------------|----------------------|------|-----------------|--------------|
| CKNXFM<br>ON | Wingham |  | 269C1<br>101.7 | 100. DA<br>216.0 | 44-05-26<br>81-12-26 | 65.1 | 225.22<br>44.22 | 181<br>CLEAR |
|--------------|---------|--|----------------|------------------|----------------------|------|-----------------|--------------|

SPECIALLY NEGOTIATED SHORT-SPACED ALLOCATION

|               |               |  |               |              |                      |       |                 |             |
|---------------|---------------|--|---------------|--------------|----------------------|-------|-----------------|-------------|
| WDETFM<br>LIC | Detroit<br>MI |  | 270B<br>101.9 | 79.<br>137.0 | 42-21-28<br>83-03-55 | 150.5 | 115.90<br>46.90 | 69<br>CLEAR |
|---------------|---------------|--|---------------|--------------|----------------------|-------|-----------------|-------------|

COMM. CH. OPER. EDUC. - GRANDFATHERED AT 79KW @ 137M HAAT.

|               |               |  |                |              |                      |      |                |             |
|---------------|---------------|--|----------------|--------------|----------------------|------|----------------|-------------|
| WLEWFM<br>LIC | Bad Axe<br>MI |  | 271C2<br>102.1 | 50.<br>150.0 | 43-53-28<br>83-07-26 | 36.2 | 86.27<br>31.27 | 55<br>CLEAR |
|---------------|---------------|--|----------------|--------------|----------------------|------|----------------|-------------|

\*\* End of separation study for channel 268A \*\*